

# EXHIBIT 3



*April 11, 2025*

**VIA ELECTRONIC MAIL**

United States Department of Justice  
Environmental and Natural Resources Division  
Law and Policy Section  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001  
Paul Cirino  
Paul.Cirino@usdoj.gov

**Re: NOTICE OF WAI OLA'S CHALLENGE TO DEFENDANTS' DCRIT  
DESIGNATIONS; 1:22-cv-00272-LEK-RT**

Dear Counsel,

To facilitate prompt production of documents, the Parties agreed to a Protective Order. Dkt. no. 81. To date, the US Department of the Navy ("Navy") has produced a total of 1,421 documents responsive to discovery requests served by Plaintiff Wai Ola Alliance ("Wai Ola" or "Plaintiff") (together with the Navy, the "Parties"). Approximately 1,059 of the produced documents are labeled as "Subject to Protective Order- Highly Confidential," which designates those documents as DCRIT (Dep't of Defense Critical Infrastructure Security Information) and subject to confidentiality requirements under the Protective Order. Wai Ola now challenges the DCRIT designation of the 26 documents listed in Exhibit A hereto pursuant to paragraph 12 of the Protective Order. Wai Ola has found no clear basis for the protection of these documents under the Protective Order. Should the Navy decline to re-designate the listed documents as non-DCRIT or justify the current designation, this letter shall serve as written notice of Wai Ola's intent to bring a motion to challenge the designation of the DCRIT Documents, and Wai Ola accordingly requests a meet and confer to discuss the basis for its challenge. Protective Order ¶ 12(b).

**I. The Protective Order**

**A. DCRIT Designations Under the Protective Order**

The Protective Order allows the Parties to designate documents produced over the course of discovery as DCRIT when such information takes the definition at 10 U.S.C. § 130e(f), whether such information has been exempted upon a written determination as set forth in 10 U.S.C. § 130e(a) or has been determined to presumptively meet the definition in 10 U.S.C § 130e(f) pending a written determination as set forth in 10 U.S.C § 130e(a). *See* Protective Order

¶ 1(m). Under 10 U.S.C. § 130e(f), the term DCRIT includes sensitive but unclassified information that if disclosed:

- (1) would reveal vulnerabilities in critical infrastructure and
- (2) if exploited, would likely result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities,
- (3) including information regarding the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense,
- (4) including vulnerability assessments prepared by or on behalf of the Department of Defense, explosives safety information (including storage and handling), and other site-specific information on or relating to installation security.

#### B. Designation Challenges

The Protective Order allows for good faith challenges to designations by either party at any time. Protective Order ¶ 12. The challenging party must provide notice to the designating party of each designation that it challenges, along with the basis for each challenge. Protective Order ¶ 12 (b). The Parties must meet and confer within ten (10) days of service of the notice and the Protective Order offers the designating party an additional fourteen (14) days to respond, after which the challenging party may bring a motion to resolve any remaining designation disputes. Protective Order ¶¶ 12 (c)-(e).

When a 10 U.S.C. § 130e(f) confidentiality designation is challenged, the burden of persuasion rests upon the designating party. *Phillips v. Gen. Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002); *see also Est. of Vinberg v. United States*, No. 3:22-cv-00135-SLG, 2024 U.S. Dist. LEXIS 189406 (D. Alaska Oct. 17, 2024). For documents to remain confidential under a protective order, the designating party must establish good cause for each particular document for which protection is sought by demonstrating that harm or prejudice would result from removing the designation. Fed. R. Civ. P. 26(c); *Phillips*, 307 F.3d at 1210-11. If the designating party establishes good cause, the court must balance public and private interests to determine whether protection is warranted. *Phillips*, 307 F.3d at 1211. There is “a general right to inspect . . . public records and documents, including judicial records and documents.” *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589 (1978). Unless a particular court record is one that has been “traditionally kept secret,” “a strong presumption in favor of [public] access is the starting point.” *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006) (internal quotation marks omitted) (*quoting Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)).

## II. **Basis for Plaintiffs’ Challenges to DCRIT Designations**

Exhibit A, attached, provides each DCRIT designated document Wai Ola challenges, as well as the basis for the challenge, premised on one or more of the below factors, each of which renders the Navy’s DCRIT designation inappropriate and inapplicable:

- (1) Documents that contain information no longer current or up to date and thus do not implicate current vulnerabilities in Department of Defense infrastructure;

- (2) Documents that contain information otherwise publicly available and thus do not reveal vulnerabilities in critical infrastructure that has not been previously revealed or available elsewhere;
- (3) Documents that contain maps or site-specific information for infrastructure that is no longer in use by the Department of Defense and thus does not implicate national security concerns;
- (4) Documents that contain information, such as maps or location details, for infrastructure visible to the military personnel and civilian contractors with daily access the Red Hill facility; and
- (5) Documents that contain information that weighs in favor of public disclosure where the potential harm from release of designated information is not substantiated.

\*\*\*

We are available to meet and confer at the following times:

- Monday April 14 at 3pm EST - 6pm EST
- Tuesday April 15 at 11am EST - 6pm EST
- Monday April 21 at 10 am EST – 6pm EST

We look forward to your response.

Sincerely,

/s/ Kristina Hambley  
Kristina Hambley  
kristina@sycamore.law

cc.

David Mitchell; David.Mitchell@usdoj.gov

Lucy Brown; Lucy.E.Brown@usdoj.gov

Dana Barbata; Dana.Barbata@usdoj.gov

Exhibit A					
No.	Document Name	Bates Start	Bates End	Confidentiality	Plffs' Basis for Designation Revocation
1	SGH Report	NAVY_0004586	NAVY_0004972	Highly Confidential	<p>(1) The SGH report was generated in 2022 prior to the defueling of the 20 USTs at Red Hill. Given that defueling operations are complete, the USTs are no longer in use, the assessment of vulnerabilities related to these infrastructure elements is no longer current.</p> <p>(2) Because the report is no longer current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) While the SGH report includes the general locations of various pipelines, it does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The SGH report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the SGH report—such as the marine structures that remain in use—are visible to anyone with access to Pearl Harbor.</p>
2	Final Hotel Pier Plume Delineation	NAVY 0042005	NAVY 0042046	Under Navy Review/ cannot be released without the review and written permission of the United States Navy. (Note, the Navy has produced several copies of this report with varying designations, some pending additional review and others designated as Highly Confidential.)	<p>(1) The Navy released a redacted version of the Plume Delineation report online, which remains available to the public. Furthermore, the Navy has not designated as DCRIT the Hotel Pier Quarterly Release Response Reports from years 2021 through 2024, related to the Hotel Pier spill from VS3 in 2021, which includes much of the same location information. There is no information within this report that is not already publically available elsewhere.</p> <p>(2) Hotel Pier has undergone repairs since the publication of the report in 2022, therefore the assessment of vulnerabilities in critical infrastructure, as outlined in the report, no longer reflects the current status of Hotel Pier.</p> <p>(3) Because the report is no longer current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) While the report includes the general location pipelines at and around Hotel Pier, it does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The Hotel Pier Plume Delineation report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the pipeline that run beneath Hotel Pier and the wharfs from which the spill was identified—are visible to anyone with access to Pearl Harbor.</p>
3	Derrell Saul, Navy On-Scene Coordinator Representative, U.S. Navy, Incident Status Summary p. 1 (Mar 17, 2021)	NAVY_0002529	NAVY_0002531	Highly Confidential	<p>(1) The Navy has made a redacted version of this report available to the public. The name of only one location, the Lanai wall, where the leak was identified and booming was placed, is redacted from the document. Given that adjacent locations, H5 and H6, which were also identified as the general location of the leak, are identified in this document as well as other publically available documents, this document does reveal information about infrastructure that has not been previously revealed or available elsewhere.</p> <p>(2) The report does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the Lanai Wall—are visible to anyone with access to Pearl Harbor.</p>
4	Letter from Sherri Eng, Dir., Reg'l Env't Dep't, U.S. Navy, to Roxanne Kwan, Haw. Dep't of Health (July 23, 2021) ("2021 Navy Letter to DOH")	NAVY_30B6_00 01940	NAVY_30B6_00 01941	Highly Confidential	<p>(1) This letter attaches the release "Confirmed Release Notification Form" for the July 16, 2021 Kilo Pier petroleum release event. This spill has since been contained and the source of the spill, a corroded pipeline, repaired. Therefore, the vulnerabilities in the Kilo Pier pipeline provided in this report, no longer reflects the current status of Kilo Pier.</p> <p>(2) The Navy has made the Confirmed Release Notification Form for the 2020 Hotel Pier release event, a much larger and environemntally harmful release, publically available, highlighting inconsistencies within the Navy's designation process as both forms contain similar information regarding the dates, locations, and immediate response actions following petroleum releases into Pearl Harbor.</p> <p>(3) The report does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the Kilo Pier —are visible to anyone with access to Pearl Harbor.</p> <p>(6) Documents related to spill reporting weigh in favor of public disclosure as petroleum spills at Pearl Harbor have a direct impact on human health and safety.</p>

5	SGH Report Completed Repair Spreadsheet	NAVY_0086049	NAVY_0086049	Highly Confidential	<p>(1) The April 2022 SGH report recommended a series of facility repairs required prior to defueling, organized by priority and location. This spreadsheet lists repairs that have been completed in accordance with the SGH report. Because the report is no longer current and does not contain present infrastructure vulnerabilities, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The location information in the spreadsheet is not redacted in the publicly available version of the SGH report as well as other publicly available documents, and thus does not reveal vulnerabilities in critical infrastructure that has not been previously revealed or available elsewhere.</p> <p>(3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The SGH spreadsheet does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the SGH report—such as the marine structures that remain in use—are visible to anyone with access to Pearl Harbor.</p>
6	NAVSUP FLC Pearl Harbor, HI (PRL) Integrity Management Plan-POL Pipelines Pre-Final Submittal May 2015. Enterprise Engineering, Inc. (Enterprise, 2015)	NAVY_30B6_0000883	NAVY_30B6_0001238	Highly Confidential	<p>(1) This third-party assessment and recommendation, which includes pipeline testing and site visit results, was conducted nearly a decade ago. Documents which contain information that is no longer current or up to date and thus do not implicate current vulnerabilities in Department of Defense infrastructure.</p> <p>(2) Because the report is no longer current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(6) The report contains infrastructure location information that is publicly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
7	NAVSUP FLC Pearl Harbor, HI (PRL) Integrity Management Plan-POL Pipelines, Fleet Logistics Center (FLC) Joint Base Pearl Harbor (PRL), May 2019. Enterprise Engineering, Inc. (Enterprise, 2019)	NAVY_30B6_0001600	NAVY_30B6_0001860	Highly Confidential	<p>(1) This third-party assessment and recommendation, which includes pipeline testing and site visit results, was conducted nearly five years ago. Documents which contain information that is no longer current or up to date and thus do not implicate current vulnerabilities in Department of Defense infrastructure.</p> <p>(2) Because the report is no longer current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(6) The report contains infrastructure location information that is publicly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
8	NAVSUP Contract Report, POL Pipelines Integrity Management Plan, Volume One, Naval Station Pearl Harbor (PRL) Parts 1-3, October 2023. Austin Brockenbrough and Associates, LLC. (Brockenbrough, 2023)	NAVY_0042881	NAVY_0043011	Highly Confidential	<p>(1) The document provides technical details about pipeline condition and pipeline management, which are standard industry practices and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infrastructure location information that is publicly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>

9	NAVSUP Contract Report, POL Pipelines Integrity Management Plan, Volume One, Naval Station Pearl Harbor (PRL) Parts 1-3, October 2023. Austin Brockenbrough and Associates, LLC. (Brockenbrough, 2023)	NAVY_0043012	NAVY_0043195	Highly Confidential	(1) The document provides technical details about pipeline condition and pipeline management, which are standard industry practices and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (2) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (3) The report does not contain site specific information relating to installation security. (4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor. (5) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).
10	Fuel Transfer System Inspection Report; Fuel Transfer Infrastructure Assessment, Naval Facilities Engineering Systems Command (NAVFAC) Engineering and Expeditionary Warfare Center (EXWC). August 2022. Austin Brockenbrough & Associates, LLC.	NAVY_0005506	NAVY_0006589	Highly Confidential	(1) This third-party assessment and recommendation, which includes pipeline testing and site visit results, was conducted three years ago. Documents which contain information that is no longer current or up to date and thus do not implicate current vulnerabilities in Department of Defense infrastructure. (2) The document provides technical details about pipeline management and safety protocols, which are standard industry practices and do not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (4) The report does not contain site specific information relating to installation security. (5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.
11	Spill History. Spreadsheet. Joint Base Pearl Harbor-Hickam Oahu HI. 9 December 2024. (NAVY_0058622)	NAVY_0058622	NAVY_0058622	Highly Confidential	(1) The Navy has made the Confirmed Release Notification Form for the 2020 Hotel Pier release event, a much larger and environemntally harmful release, publically available, highlighting inconsistencies within the Navy's designation process as both forms contain similar information regarding the dates, locations, and immediate response actions following petroleum releases into Pearl Harbor. (3) The report does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (4) The report does not contain site specific information relating to installation security. (5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the Kilo Pier—are visible to anyone with access to Pearl Harbor. (6) Documents related to spill reporting weigh in favor of public disclosure as petroleum spills at Pearl Harbor have a direct impact on human health and safety.
12	Fuel System Inspection Report Final Submittal November 4, 2022. Submitted by Austin Brockenbrough. (Brockenbrough, 2022b)	NAVY_30B6_0002109	NAVY_30B6_0002314	Highly Confidential	(1) This third-party inspection report was conducted three years ago. Given that defueling operations are complete, the USTs are no longer in use, much of the published information is no longer current or up to date and thus does not implicate current vulnerabilities in Department of Defense infrastructure. (2) Because the report is no longer current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (4) The report does not contain site specific information relating to installation security. (5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor. (6) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).



13	Operation, Maintenance, Environmental, and Safety Plan Defense Fuel Support Point Pearl Harbor Bulk Terminal Pearl harbor, Hawaii. December 2023 submitted by Pond and bhate. (Pond/bhate, 2023)	NAVY_30B6_0004012	NAVY_30B6_0004335	Highly Confidential	(1) This document primarily outlines operational procedures and safety protocols and does not detail critical infrastructure or national security threats. (2) Because the report addresses safety and environmental concerns and does not contain information that would compromise national defense if released, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (4) The report does not contain site specific information relating to installation security. (5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor. (6) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).
14	Operation, Maintenance, Environmental, and Safety Plan Defense Fuel Support Point Pearl Harbor Bulk Terminal Pearl harbor, Hawaii. December 2023 submitted by Pond and bhate. (Pond/bhate, 2023)	NAVY_0068580	NAVY_0068895	Highly Confidential	(1) This document primarily outlines operational procedures and safety protocols and does not detail critical infrastructure or national security threats. (2) Because the report addresses safety and environmental concerns and does not contain information that would compromise national defense if released, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (4) The report does not contain site specific information relating to installation security. (5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor. (6) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).
15	Operation, Maintenance, Environmental, and Safety Plan; Defense Fuel Support Point, Pearl Harbor Bulk Terminal, Pearl Harbor, Hawaii. August 2018 submitted by Trinity, Bhate, and JV LLC, with support from Pond & Company.	NAVY_0006608	NAVY_0007489	Highly Confidential	(1) This document primarily outlines operational procedures and safety protocols and does not detail critical infrastructure or national security threats. (2) Because the report addresses safety and environmental concerns and does not contain information that would compromise national defense if released, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (3) Subsequent versions of this report have been published since the release of this version in 2018. Because the information is not current, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities. (4) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (5) The report does not contain site specific information relating to installation security. (6) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor. (7) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).
16	Kilo Pier Sequence of Events, July 16, 2021.	NAVY_0070979	NAVY_0070979	Highly Confidential	(1) This document sets out the Navy's hourly response to the 2021 Kilo Pier spill on July 16, 2021. No sensitive location or infrastructure information is disclosed in this document. (2) The report does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense. (3) The report does not contain site specific information relating to installation security. (4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the Kilo Pier—are visible to anyone with access to Pearl Harbor. (5) Documents related to spill reporting weigh in favor of public disclosure as petroleum spills at Pearl Harbor have a direct impact on human health and safety. (6) Information related to the Kilo Pier spill has is available publicly on the Hawaii Dep't of Health website.



17	JBP HH- Sustainment, Restoration and Modernization Funding- Upper Tank Farm, Pipeline and Piers. Spreadsheet.	NAVY_30B6_0002107	NAVY_30B6_0002108	Highly Confidential	<p>(1) This spreadsheet lists past repairs made to the facility with vague descriptions that lack identifying details, so sensitive location or infrastructure information is not disclosed in this document.</p> <p>(2) The report does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report—such as the marine infrastructure —is visible to anyone with access to Pearl Harbor.</p>
18	Spill Prevention, Control, and Countermeasure (SPCC) Plan for Commander Navy Region Hawaii (CNRH), NAVFAC Hawaii. December 2019. PCCI Marine & Environmental Engineering (PCCI, Inc)	NAVY_0011577	NAVY_0012546	Highly Confidential	<p>(1) An SPCC plan is a required document for facilities that store or handle oil in quantities that could potentially reach navigable waters, outlining steps to prevent spills and minimize harm to the environment. This document primarily outlines operational procedures and safety protocols, rather than detailing critical infrastructure or national security threats.</p> <p>(2) Because the report addresses safety and environmental concerns and does not contain information that would compromise national defense if released, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) The report includes only the general locations of various pipelines and fuel-related infrastructure, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(6) The report contains infratructure location information that is publically available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
19	2024 Annual Leak Detection Testing Report of 29 Sections of Petroleum Pipelines, Joint Base Pearl Harbor-Hickam Oahu HI. 12 September 2024. Michael Baker International.	NAVY_0068095	NAVY_0068228	Highly Confidential	<p>(1) The document provides details about pipeline condition, which is a standard industry practice and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infratructure location information that is publically available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
20	Revised 2023 Second Annual Leak Detection Testing Report of 51 Sections of Petroleum Pipelines. Joint Base Pearl Harbor-Hickam Oahu HI. 6 October 2023. Michael Baker International.	NAVY_0068229	NAVY_0068374	Highly Confidential	<p>(1) The document provides details about pipeline condition, which is standard industry practices and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infratructure location information that is publically available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>

21	2022 Annual Leak Detection Testing Report of 49 Sections of Petroleum Pipelines, Joint Base Pearl Harbor-Hickam Oahu HI. 10 March 2022. Michael Baker International.	NAVY_0065538	NAVY_0065695	Highly Confidential	<p>(1) The document provides details about pipeline condition, which is standard industry practices and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) Given that defueling operations are complete, the USTs are no longer in use, pipeline assessments related to these infrastructure elements is no longer current.</p> <p>(3) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(6) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
22	2021 Annual Leak Detection Testing Report of 35 Sections of Petroleum Pipelines, Joint Base Pearl Harbor-Hickam Oahu HI. 22 March 2021. Michael Baker International.	NAVY_0065431	NAVY_0065537	Highly Confidential	<p>(1) The document provides details about pipeline condition, which is standard industry practices and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) Given that defueling operations are complete, the USTs are no longer in use, pipeline assessments related to these infrastructure elements is no longer current.</p> <p>(3) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The report does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(6) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
23	USACE Fuels Program (RMMR) Pearl Harbor FY14 to FY 24. Spreadsheet.	USACE_0000001	USACE_0000001	Highly Confidential	<p>(1) This spreadsheet sets out completed facility repairs dating back to 2014, including facility repairs required prior to defueling.</p> <p>(2) Because the report is no longer current and does not contain present infrastructure vulnerabilities, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(3) The spreadsheet only includes the general locations of Navy owned infrastructure, it does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(4) The spreadsheet does not contain site specific information relating to installation security.</p> <p>(5) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the spreadsheet—such as the marine structures that remain in use—are visible to anyone with access to Pearl Harbor.</p>
24	NAVFAC Contract Report, Fuel Transfer Infrastructure Assessment Transfer Piping Inspection UGPH 59- Hotel Pier November 2022	NAVY_0070363	NAVY_0070572	Highly Confidential	<p>(1) The document provides an assessment of pipeline condition, management, and safety protocols, which are standard industry practice and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>

25	POL Pipelines Integrity Management Plan (IMP) (Oct. 2023) Part 4 Additional Supporting Information	NAVY_0042047	NAVY_0042880	Highly Confidential	<p>(1) The document provides an assessment of pipeline condition, management, and safety protocols, which are standard industry practice and does not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
26	2024 Annual Static Liquid Pressure Testing Report of One Section of Petroleum Pier Pipeline, Joint Base Pearl Harbor-Hickam, Hawaii (Feb. 2024)	NAVY_0069905	NAVY_0069971	Highly Confidential	<p>(1) The document provides details about pipeline condition, which are standard industry practices and do not contain sensitive information that could pose a significant risk if disclosed, so there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The report includes only the general locations of various pipelines, and does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The report does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the report are visible to anyone with access to Pearl Harbor.</p> <p>(5) The report contains infratructure location information that is publicaly available in published reports and publicly accessible mapping of Navy owned Pearl Harbor infrastructure (ie. Google Maps).</p>
27	NACFAV POL Out of Service Requirements FY 25, Repair Scope Determination and Acceptance Satisfactory to Stakeholders	SGH0000023	SGH0000026	Highly Confidential	<p>(1) Because the spreadsheet only includes the general locations of Navy owned infrastructure, there is no risk of exploitation that result in the significant disruption, destruction, or damage of or to Department of Defense operations, property, or facilities.</p> <p>(2) The spreadsheet only includes the general locations of Navy owned infrastructure, it does not include information regarding the the securing and safeguarding of explosives, hazardous chemicals, or pipelines, related to critical infrastructure or protected systems owned or operated by or on behalf of the Department of Defense.</p> <p>(3) The spreadsheet does not contain site specific information relating to installation security.</p> <p>(4) Each day, hundreds of military personnel and civilian contractors access the Red Hill facility. Infrastructure elements mentioned in the spreadsheet—Sierra Pier, Mike Pier and Bravo Dock—are visible to anyone with access to Pearl Harbor.</p>